

West Lothian Local Development Plan Main Issues Questionnaire

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West Lothian
Council

The council has commenced preparation of its first *Local Development Plan* (LDP). The LDP will replace the *West Lothian Local Plan* and will set out a local interpretation of the requirements of the *Strategic Development Plan* (SESplan) and national guidance. The LDP is a land use plan that identifies site specific development opportunities, sets out the council's key development priorities and provides the policy context for the consideration of applications for planning permission.

The current *West Lothian Local Plan* was adopted by the council in January 2009 is available to view on the council's website at <http://www.westlothian.gov.uk/WLLP>

The *Main Issues Report* (MIR) for the West Lothian LDP is the first key stage in the preparation of the LDP and we are seeking your views on this. All documentation for the MIR can be viewed at <http://www.westlothian.gov.uk/MIR>

Full details on the timetable and stages for preparing the LDP are set out in the Development Plan Scheme 6 which is also available online: <http://www.westlothian.gov.uk/article/2725/Development-Plan-Scheme>

A questionnaire to accompany the MIR is set out below and we would be happy if you would complete and return to us.

There are 98 questions that accompany the *Main Issues Report*. You do not have to respond to all of the questions set out only those which you feel are of particular relevance to you. Completed questionnaires should be returned to us by e-mail to wlldp@westlothian.gov.uk by no later than **5pm on Friday, 17 October 2014**.

Alternatively, please download a copy of the form and send it to us at: Development Planning, West Lothian Council, County Buildings, High Street, Linlithgow, EH49 7EZ (postal address only).

You can keep up to date on the LDP by subscribing to our LDP e-newsletter. If you have not already subscribed, you can do so by going to the following link and following the relevant instructions:

<https://newsletters.westlothian.gov.uk/eNewsletterPro/optin/optinealert.htm>

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Please note that any comments you make will be open to public scrutiny, but we will keep your contact details private and confidential and will only use your name or business name.

By filling in this questionnaire you are helping to shape the future of West Lothian

It would also be helpful if you would complete the *Equal Opportunities Questionnaire*, set out at the end of this document.

Local Development Plan Vision Statement

By 2024 West Lothian's population will have grown and an improved employment position within a more diversified local economy will have been established. It will be better connected by road and public transport and will have a greater choice of housing and an appropriate range of education, community, health, retail, recreation and leisure facilities and a network of green spaces to meet the needs of its growing population. Development will take place in a sustainable way that protects and improves the area's built and natural heritage assets, meets the challenges of climate change and renewable energy and helps regenerate deprived areas and improves the quality of life for people living in West Lothian.

Question 1

Do you agree with the *vision for the LDP*, or, are there other aspects that should be considered?

YES NO Don't know

Do you have any additional comments?

Question 2

Do you have an alternative vision, and if so, what is it?

The aims of the *Main Issues Report* and Associated Main Issues are set out in pages 13 of the MIR.

Question 3

Do you agree with the proposed 'Aims' of the LDP? If not, why not?

Question 4

Do you have an alternatives, and if so, what are they?

Main Issue 1: Economic Development and Growth (paragraphs 3.1 - 3.31)

Which areas of West Lothian would be best to direct new economic development towards?

How can the LDP support the council's *Economic Strategy* and facilitate the creation of jobs?

Preferred approach

The council's *preferred approach* to employment land is to review the range of uses which could be accommodated on employment land with a view to accommodating a more flexible approach. This flexible approach will involve removing the single user status of two large sites (Linhouse and Eliburn in Livingston), and allowing a wider range of uses on currently allocated employment sites at locations to be identified in the LDP. Such an approach, for example, would apply to certain traditional employment allocations and industrial estates such as East Mains Industrial Estate, Broxburn and Deans & Houstoun Industrial Estates, Livingston and at Whitehill and Whiteside Industrial Estates, Bathgate and Murraysgate, Whitburn reflecting the broad range of uses which already exist at these locations and to allow for other employment/commercial orientated uses to be accommodated e.g. car showrooms, trade centre outlets and certain leisure uses.

The LDP will continue to support development of existing employment allocations, including sites within the core development areas, and support the servicing of employment allocations to assist in attracting inward investment. New employment land allocations will also be identified to supplement and in some cases complement the existing supply, including a new strategic employment site at Balgornie adjacent to the recently opened Junction 4a on the M8 at Whitburn.

In addition, the LDP will seek to encourage small business development by promoting small workshop developments within communities and home working in appropriate locations. In a limited number of cases, existing employment land is identified as being suitable for potential residential development.

The council's preferred use of the former Vion plant in Broxburn is to allocate the site for housing.

The preferred approach would also include meeting the requirements of the SDP in full.

Alternative approach

The council's '*Alternative*' approach to employment land is to restrict the range of uses which can be accommodated on employment sites, and to seek to augment the existing portfolio (including Linhouse) by identifying new strategic or local employment sites beyond existing allocations and SESplan requirements to maximise land availability and choice for potential employers. This would, however, result in an oversupply of employment land and could see large employment estates located in non-sustainable, greenfield locations that could have associated local traffic, infrastructure and environmental impacts.

In relation to the former Vion plant at Broxburn the council's alternative approach is to continue to allocate the site for employment use.

Question 5

Do you agree with the 'Preferred' approach to employment land which would introduce an opportunity for a broader range of land use to be supported within existing employment land allocations and industrial estates?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 6

Do you agree with the 'Alternative' approach to employment land?

YES NO Don't know

Do you have any additional comments?

Question 7

Do you have any other alternative approaches? What are they and how would you make them work?

Question 8

Has the council identified enough employment land in West Lothian to meet requirements and are the larger employment sites in the right locations?

YES NO Don't know

Do you have any additional comments?

Question 9

Do you agree that the single user employment site at Linhouse, Livingston (ELv54) should be sub-divided for employment and mixed uses, including residential use of up to 250 houses?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 10

Do you agree that the former strategic employment allocation at Eliburn, Livingston (ELv25) should continue to be promoted for employment uses but not as a single user site?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 11

Do you agree that a site at Baggornie Farm, north of Whitburn, should be allocated for strategic employment land purposes?

If not, why not?

What other locations would you suggest?

YES NO Don't know

Do you have any additional comments?

Main Issue 2: **Community Regeneration** (paragraphs 3.31 - 3.34)

Where should the focus for community regeneration in West Lothian be and what should this seek to deliver?

How can the LDP incentivise development to take place within regeneration areas?

How can the LDP support the council's Regeneration Plan?

Preferred approach

The council's preferred approach to community regeneration is to focus regeneration initiatives on areas identified in the Scottish Index of Multiple Deprivation 2012. This principally includes the smaller settlements in the west of West Lothian identified as Armadale, Blackburn, Blackridge, Fauldhouse, Stoneyburn and Whitburn. Other areas include Bathgate and Boghall and settlements within the Breich Valley where headline levels of disadvantage including unemployment, financial exclusion, poor health and lower education attainment have been identified.

These communities are often characterised by a range of factors which can include high levels of unemployment, low income, lower levels of education attainment, and access to services. To create more balanced communities, address issues of multiple deprivation and to attract private sector investment it is proposed to seek to identify initiatives to generate more investment in these communities.

Alternative approach

The council's alternative to community regeneration is to not pursue regeneration objectives through the development plan and to rely solely on other council led regeneration initiatives.

Question 12

Do you agree with the 'Preferred' approach to community regeneration in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 13

Do you agree with the 'Alternative' approach to community regeneration in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 14

Do you have any other alternative approaches?

What are they and how would you make them work?

Main Issue 3: Housing Growth, Delivery and Sustainable Housing Locations (paragraphs 3.35 - 3.63)

How much new housing is required in West Lothian?

Where should new housing development take place, and where should it not be encouraged?

How can the risks associated with the existing development strategy as set out in the *West Lothian Local Plan* be reduced?

How can the rate of house building in West Lothian be increased to ensure that the required five year effective housing land supply is achieved and that the assessed housing need and demand is met in full over the plan period?

Preferred Strategy

The council's preferred strategy is scenario 3 to provide for more housing than the minimum required by the supplementary guidance required to support the SDP and the LDP should allocate housing land for an additional 3,500 houses above existing committed development. This would result in a level of development beyond requirements set out in the housing supplementary guidance to support the SDP. However, this scenario is only preferred if the council can be satisfied that the infrastructure required to support this scale of development can be delivered in full and also in recognition that it is not anticipated that this increased allowance will be delivered by 2024 but is there to allow for the delivery of development into the period 2024-2032.

This recognises that the strategy in the existing adopted local plan is reliant to some extent on a limited number of large, complex sites with high infrastructure costs being brought forward. It is now considered that a range of smaller housing sites, in various locations across West Lothian, is needed in order to provide for greater choice and effectiveness of sites, introduce local flexibility for the LDP and to ensure that a generous housing land supply is available, providing as a minimum, an effective five year housing land supply at all times, as required by SPP.

There is also a need to sustain the momentum built up in some of the existing large housing growth areas and make sure that these developments are viable going forward. Modest additional allocations in some of these areas will provide a degree of future proofing of the plan and help meet part of the need and demand for housing beyond the end of the plan period. Much of the existing housing land supply in core development areas and elsewhere will not be built out within the plan period and allocating additional housing sites in these areas through the LDP will help to maintain investor confidence and inform investment planning.

The allocation required by the draft supplementary guidance prepared by SESplan of 2,130 new houses beyond existing allocations of 22,847 units provides for a total of 24,977 units over the period 2012-2024.

By contrast, the preferred strategy proposes 26,347 houses which provides 3,500 houses above the base supply houses which is an increase of around 15% above the base supply.

This scale of housing allocation will reduce the risk of the LDP development strategy not being successful and is justified on the basis of:

- the need to maintain a five year supply of effective housing land at all times as required by Scottish Government planning policy;
- the need to ensure that there is a generous supply of housing land to accommodate the needs and demands of those seeking a house in West Lothian;
- the need to maintain West Lothian's attractiveness as an area which provides a range and choice of housing sites for those wishing to invest;
- linking the council's Economic Strategy to that of the housing market by providing a range and choice of house types suitable to indigenous and inward investors and the construction industry;
- providing for future affordable housing build programmes;
- continuing to redevelop appropriate brownfield sites;
- allowing the WLLP core development allocations and the strategic allocation at Heartlands, Whitburn to deliver over the long term whilst achieving the five year effective supply through the allocation of predominantly small to medium sized sites where requirements for infrastructure to assist delivery are less onerous on developers;
- allocating above 3,500 will generate the need for a 4th new secondary school which will be expensive to deliver in addition to existing infrastructure commitments;
- replacing allocations in the adopted *West Lothian Local Plan* which may no longer be supported by the site owners or due to reasons of development viability; and
- recognising that as the LDP progresses some housing sites may be delayed or may no longer come forward for a variety of reasons including unexpected development viability.

The preferred strategy is based around an aspiration for growth aimed at delivering sustainable economic prosperity and quality of life for communities in West Lothian and in particular building on the existing significant core development area allocations and strategic sites and will provide a broader range of housing sites.

Alternative Strategy 1

Alternative Strategy 1 reflects scenario 2 set out above and proposes that the LDP should allocate housing land for an additional 2,600 houses, above existing committed development. This would result in a level of development beyond SDP requirements set out in the draft supplementary guidance.

This proposes allocating land for 25,447 houses i.e. 2,600 houses above existing commitments to provide a housing land supply which is around 1.4% more than SDP requirements. This alternative strategy 1 is a variation on the preferred strategy but with a smaller increase in housing allocations above the minimum requirement in the SDP. Whilst Alternative Strategy 1 will provide more choice than Alternative Strategy 2 (see below) there is a risk that the housing supply will not be regarded as sufficiently generous and that an effective five year housing land supply will not be available at all times because existing large sites are taking longer to get underway and build out. This could mean that other sites not allocated for development could be promoted for development and receive planning permission contrary to the development plan. Where the five year land supply is not maintained this could leave the council open to planning by appeal.

Alternative Strategy 2

Alternative Strategy 2 reflects scenario 1 set out above and proposes that the LDP allocates housing land for an additional 2,130 houses above existing committed development. This would result in the requirement set out in the draft supplementary guidance being met but would not allow for any flexibility. A total of 24,977 houses, i.e. 2,130 houses above existing commitments, as required by the supplementary guidance for the SDP but with no flexibility allowance for additional development. This strategy represents a view that West Lothian should grow more slowly.

Whilst this alternative strategy may have certain attractions in terms of minimising impact on the environment and the need for additional infrastructure, it may mean that an effective five year housing land supply is not maintained at all times and could lead to relative economic decline whereby neighbouring authorities supporting higher growth scenarios, are better placed to take advantage of a potential economic upturn and recovery. Where the five year land supply is not maintained this could leave the council open to planning by appeal.

All of these reasons require to be balanced against the need to secure sustainable well located development, protect important environmental assets and landscapes of West Lothian and to have regard to impacts on existing communities and existing and future infrastructure requirements which are likely to arise. This will allow the LDP to focus on improving the quality of our existing established communities, facilities and environment as opposed to being negative in terms of other authorities benefitting from an upturn and the issue of planning by appeal and review a potential increase in housing numbers in the next LDP if economic recovery has indeed taken place in the first plan period.

Question 15

Do you agree with the 'Preferred' strategy for housing growth in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 16

Do you agree with 'Alternative Strategy 1' for housing growth in West Lothian?

If so, why?

YES NO Don't know

Do you have any additional comments?

Question 17

Do you agree with 'Alternative Strategy 2' for housing growth in West Lothian? If so, why?

Question 18

Do you have another alternative strategy?

What is it and how would you make it work?

Question 19

How can the council maintain an effective five year housing land supply given the current economic climate?

Preferred and alternative options for housing sites, including potential de-allocations from the *West Lothian Local Plan* (paragraphs 3.64 – 3.73)

Preferred Option

The council's preferred option is that some housing sites allocated in the adopted *West Lothian Local Plan* and identified in Housing Land Audit 2012 are not included in the LDP. Details of sites are set out in the Settlement Statements accompanying the MIR.

Alternative Option

The council's alternative option is that all housing sites allocated in the adopted *West Lothian Local Plan* and identified in Housing Land Audit 2012 be included in the LDP.

Question 20

Do you agree with the 'Preferred' option for the removal of existing housing allocations from the development plan?
If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 21

Do you agree with the 'Alternative' option for the removal of existing housing allocations from the development plan?
If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 22

Do you have any other alternative options?
What are they and how would you make them work?

YES NO Don't know

Do you have any additional comments?

Preferred Approach to the Core Development Areas

The council's 'Preferred' approach to the core development areas is to continue to support their delivery and allow for further longer term allocations at Winchburgh.

Alternative Approach to the Core Development Areas

The council's 'Alternative' approach is not to allow for any further development beyond that set out in approved master plans and the *West Lothian Local Plan*.

Question 23

Do you agree with the 'Preferred' approach to the core development areas?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Full details of the representations are included in the accompanying supporting statement

RTL makes representation to the non-allocation of land at Niddry Mains Golf Course for mixed use, including residential, development and associated uses (EOI-201).

RTL makes representation to the non-allocation of land at Niddry Mains Golf course for mixed use, including residential, development and associated uses (EOI-199).

RTL makes representation to the non-allocation of the existing Niddry Castle Bing for long term mixed use development, including residential, uses (EOI-200).

RTL makes representation to the inclusion of site EOI-0198 as a preferred alternative site for residential development. This forms part of planning permission 1012/P/05 and it is inappropriate for the Council to identify it for residential development through the Local Development Plan process.

RTL supports the continued identification of Proposal HWh3

Question 24

Do you agree with the 'Alternative' approach to the core development areas?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 25

Do you have any other alternative options?

What are they and how would you make them work?

YES NO Don't know

Do you have any additional comments?

Preferred Approach to Heartlands, Whitburn

The council's 'Preferred' approach to Heartlands, Whitburn is to look favourably on proposals for additional housing within the existing housing allocation, subject to infrastructure constraints being resolved.

Alternative Approach

The council's 'Alternative' approach is that the number of houses at "Heartlands" be restricted to 2,000.

Question 26

Do you agree with the 'Preferred' approach to Heartlands, Whitburn?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 27

Do you agree with the 'Alternative' approach to Heartlands?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 28

Do you have any other alternative options?

What are they and how would you make them work?

YES NO Don't know

Do you have any additional comments?

Preferred approach

The council's 'Preferred' approach to Linlithgow is that the "area of restraint" be re-considered to allow for greenfield release of housing, employment and potential tourist related development. Should the area of restraint be removed, any development would be dependent upon the delivery of a new secondary school at Winchburgh and therefore would be focussed principally in latter plan period. Any land release would follow a sequential approach as set out in paragraph 3.93

Alternative approach

The council's 'Alternative' approach to Linlithgow is that the "area of restraint" approach be maintained and that development be directed to brownfield opportunities within the existing settlement boundary in the first instance and thereafter greenfield release within the town.

Question 29

Should the definition of Linlithgow as an 'area of restraint' be removed, and if so, how should the town be developed in the future?

YES NO Don't know

Do you have any additional comments?

Should a sequential approach be applied to the release of land in and around Linlithgow to accommodate any new development?

YES NO Don't know

Do you have any additional comments?

Question 30

What alternatives are available in order to meet demand for housing (including affordable housing) and employment land opportunities in Linlithgow?

Question 31

Should land continue to be safeguarded for west facing slip roads on the M9 at Junction 3, Linlithgow?
If so, should new development be promoted in Linlithgow to ensure that funding for these can be secured?

YES NO Don't know

Do you have any additional comments?

Preferred approach

The council's 'Preferred' approach to the Deans South estate, Livingston, is that the area be identified for comprehensive redevelopment for approximately 300 new houses.

Alternative approach

The council's 'Alternative' approach to the Deans South estate, Livingston, is that the LDP should not identify the area for comprehensive redevelopment for approximately 300 new houses.

Question 32

Do you agree with the 'Preferred' approach for addressing the Deans South estate?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 33

Do you agree with the 'Alternative' approach for addressing the Deans South estate?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 34

Do you have any other alternative approaches?

What are these and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Preferred approach

The council's 'Preferred' approach to affordable housing is to review the terms of the current affordable housing policy and set this out in supplementary guidance.

Alternative approach

The council's 'Alternative' approach to affordable housing is to continue to implement existing policy.

Question 35

Do you agree with the 'Preferred' approach to affordable housing? If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 36

Do you agree with the 'Alternative' approach to affordable housing? If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 37

Do you have any other alternative approaches? What are they and how would you make them work?

YES NO Don't know

Do you have any additional comments?

Main Issue 4: Infrastructure Requirements and Delivery

How can we ensure that new development in West Lothian makes best use of existing infrastructure?

How can we make sure that the cost of providing new infrastructure needed to support new development does not fall unduly on the tax payer?

How can we ensure that developer contribution costs are affordable and do not make the development of sites unviable?

Infrastructure requirements and delivery – providing for community needs: education, healthcare and sports facilities

Preferred approach

The council's 'Preferred' approach to infrastructure provision, in particular education provision, is to promote additional growth which can for the most part utilise existing infrastructure capacity, and minimise additional significant new infrastructure requirements over and above existing planned upgrades and requirements. Developer contributions will continue to be sought, the basis for which will be set out in a combination of generic and specific supplementary guidance. The council's preferred approach to infrastructure delivery is supported by Policy 9 of the SDP. The preferred approach is also to further develop funding mechanisms and supplementary guidance to assist in delivery.

Alternative approach

The council's 'Alternative' approach to infrastructure provision is not to promote growth particularly that which would require substantial investment in new infrastructure given the current limited ability of the development industry to deliver up-front funding for infrastructure projects. Such an approach, however, is unrealistic and contrary to national planning policy.

Question 38

Do you agree with the 'Preferred' approach to infrastructure provision? If not, why not?

YES NO Don't know

Do you have any additional comments?

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Question 39

Do you agree with the 'Alternative' approach to infrastructure provision?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 40

Do you have any other alternative approaches?

What are they and how would you make them work?

YES NO Don't know

Do you have any additional comments?

Question 41

How can the level of infrastructure required to support the scale of development proposed be delivered?

Do you have any additional comments?

Infrastructure – transport and access in and around West Lothian (*paragraphs 3.132 – 3.159*)

Preferred approach

The council's 'Preferred' approach to promoting access to/from/within West Lothian is to address outstanding constraints in the strategic and local road network which are essential to accommodate community growth and in particular economic and housing growth and tackle existing traffic issues whilst promoting sustainable transport measures on an incremental basis in conjunction with new development, and as resources allow. Within this, the preferred approach is to promote development on or very near to existing public transport facilities or where there is potential for new facilities. This approach will help to sustain and improve services which in turn will become more attractive alternatives to the private car.

Alternative approach

The council's 'Alternative' approach to promoting access to/from/within West Lothian is to shift emphasis away from addressing road network issues to focus exclusively on sustainable transport measures, however, this is not considered a reasonable alternative given the commitment to strategic road improvements through NPF2, the SDP and the need to accommodate existing committed development across West Lothian.

Given physical, policy and resource constraints, it is not considered that there are any other reasonable alternatives to the preferred approach.

Question 42

Do you agree with the 'Preferred' approach to promoting access to/from/within West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 43

Do you agree that the council should continue to work towards the provision of a new rail station at Winchburgh?
If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 44

Do you have any other alternative approaches?
What are they and how would you make them work?

YES NO Don't know

Do you have any additional comments?

Main Issue 5: **Town Centres and Retailing** (paragraphs 3.160 – 3.171)

What do we need to do to promote and sustain our traditional town centres in West Lothian and consolidate the sub-regional centre at Almondvale, Livingston?

Preferred approach

The council's 'Preferred' approach to town centre retail provision in West Lothian is to:

- sustain and improve town centres by applying the sequential approach to proposals for retail and leisure development;
- reduce leakage from some areas in accordance with the council's Retail Capacity Study;
- facilitate the creation of a new town centre in Winchburgh;
- safeguard existing and promote new local neighbourhood centres: and
- bring about village and town centre improvements by highlighting development opportunities, supporting the development of brownfield sites, implementing improvements through the capital plan and, where appropriate, securing developer contributions.

The preferred approach includes removing retail policy restrictions currently in place in Bathgate and Linlithgow town centres to allow for a broader range of uses which will support the take up of empty units. In addition, initiatives to support and promote development above shops will be encouraged, subject to availability of infrastructure and to the operation of existing business premises not being unduly prejudiced.

Alternative approach

The 'Alternative' approach is to:

- sustain and improve town centres by applying the sequential approach to proposals for retail and leisure development;
- reduce leakage from some areas in accordance with the council's Retail Capacity Study;
- facilitate the creation of a new town centre in Winchburgh;
- safeguard existing and promote new local neighbourhood centres: and
- bring about village and town centre improvements by highlighting development opportunities, supporting the development of brownfield sites, implementing improvements through the capital plan and, where appropriate, securing developer contributions.

This approach excludes removing current retail policy restrictions in place in Bathgate and Linlithgow town centres.

Question 45

Do you agree that the 'Preferred' approach to town centres and retail provision in West Lothian is appropriate?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 46

Do you agree with the 'Alternative' approach to town centres and retail provision in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 47

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Main Issue 6: The Natural and Historic Environment (paragraphs 3.172 – 3.213)

How can planning policy promote sustainable patterns of development to protect our valued landscapes, built and cultural heritage and create a green network across West Lothian?

Preferred approach

The council's 'Preferred' approach to the West Lothian natural environment is to direct development to appropriate brownfield sites within settlements in the first instance but also to bring forward the release of greenfield sites in sustainable locations where there are no alternatives in order to meet strategic requirements. When considering greenfield release the council will have regard to the LLDR and other relevant factors, particularly sustainability but also issues of townscape and settlement coalescence. This may allow for some release of new development sites on the edge of settlements, thereby maximising use of existing infrastructure, whilst protecting visual amenity and the biodiversity value of the countryside and preventing coalescence of settlements.

In some instances it may be necessary to extend countryside and landscape designations to protect the purposes for which the land was designated be it landscape value, landscape character and landscape enhancement, buffers to coalescence of settlements, protection of prime quality agricultural land and historic gardens and designed landscapes in West Lothian.

Alternative approach

The 'Alternative' approach to the West Lothian natural environment and landscapes is to focus less on brownfield land and allow parts of designated areas to be released for housing or employment development.

Question 48

Do you agree with the 'Preferred' approach to the natural environment in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

RTL makes representation to the existing boundary of the Countryside Belt as shown in the adopted Local Plan to the south of Winchburgh at the Niddry Castle Golf Course. It is contended that the northern portion of the Niddry Castle golf course should be removed from the Countryside Belt. The current Local Plan designates a Countryside Belt between Winchburgh and East Broxburn to prevent coalescence. Representation has been lodged, separately, to the MIR that recommends an increase in the separation distance between Winchburgh and East Broxburn through a realignment of the north east corner of the East Broxburn CDA boundary. The current Local Plan notes that the landscape integrity of the area, community woodland provision and recreational access are important management objectives linked to the setting and amenity value of Greendykes Bing. It notes the potential for Heritage Park in this area. In this context, it is noted that in the Local Landscape Designation Review accompanying the Main Issues Report that there is a diversity of uses within the area to the south and west of Niddry Bing. The scale and location of the land proposed for removal from the Countryside Belt would not adversely affect the countryside setting or amenity of the local area. It will maintain landscape integrity by working development proposals within the existing landscape framework. Provision of a formal park area linked to the nearby Bings, Niddry Castle and the Union Canal is proposed as part of the wider landscape capacity submission that has been submitted separately

Question 49

Do you agree with the 'Alternative' approach to the natural environment in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 50

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Landscape approach and designation (*paragraphs 3.172 - 3.170*)

Preferred approach

The council's 'Preferred' approach to landscape designations is to reduce the number of landscape designations in order to reflect the findings of the Local Landscape Designation Review and identify candidate Special Landscape Areas (cSLA). Special Landscape Areas will replace AGLVs and Areas of Special Landscape Control. This approach is in accord with best practice and guidance prepared by Scottish Natural Heritage and Scottish Government.

Alternative approach

The council's 'Alternative' approach to landscape designations is to continue with the current approach, relying on existing policies and designations. This would not achieve the goal of updating and simplifying landscape designations in accordance with current best practice and national guidance.

Question 51

Do you agree with the 'Preferred' approach to landscape designations in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 52

Do you agree with the 'Alternative' approach to landscape designations in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 53

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Development in the countryside (*paragraphs 3.180 – 3.181*)

Preferred approach

The council's 'Preferred' approach to housing development in the countryside is to continue to support development in appropriate circumstances for example, sensitive redevelopment of steadings; limited enabling development to secure restoration of historic buildings or structures; and replacement of houses in a habitable condition. Existing Supplementary Guidance will be updated to clarify the circumstances in which development will be permitted, and the design standards expected. The current flexibility in policies on business and tourism development in the countryside will be maintained and it is proposed to carry forward the existing policy on 'very low density rural housing in the countryside' otherwise known as 'lowland crofting' but only in the west of West Lothian.

Alternative approach 1

The council's first 'Alternative' approach to housing development in the countryside is to allow relaxations to current policies, potentially by permitting more redevelopment of rural brownfield land for housing. However, this approach is inherently non-sustainable as it would result in development which is remote from services and could lead to a proliferation of undesirable, sporadic development in the countryside.

Alternative approach 2

The council's second 'Alternative' approach to housing development in the countryside is not to maintain the current policy approach. This would include a review of the current 'lowland crofting' policy.

Question 54

Is the 'Preferred' approach to housing development in the countryside appropriate?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 55

Do you agree with any of the 'Alternative' approaches to housing development in the countryside?

YES NO Don't know

Do you have any additional comments?

Question 56

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Business, tourism and recreational uses in the countryside (*paragraph 3.182*)

Preferred approach

The council's 'Preferred' approach to business, tourism and recreational uses in the countryside is to generally continue with the current policy approach set out in existing supplementary guidance.

Alternative approach

The council's 'Alternative' approach to business, tourism and recreational uses in the countryside is to allow relaxations to current policies. However, this approach could lead to a proliferation of undesirable development in the countryside.

Question 57

Do you agree with the 'Preferred' approach to business, tourism and recreational uses in the countryside?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 58

Do you agree with the 'Alternative' approach to business, tourism and recreational uses in the countryside?
If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 59

Do you have an alternative approach?
What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Green Networks, and extension to Pentland Hills Regional Park (*paragraphs 3.183 – 3.189*)

Preferred approach

The council's 'Preferred' approach to the green network is to define the part of CSGN in West Lothian as a network of multi-functional green corridors focussing on the existing network. This would build on the existing initiatives extending the network into the rural hinterland to connect with adjacent local authorities existing and emerging networks, and penetrating into urban areas, linking with the council's Open Space Strategy and Core Paths Plan.

Alternative approach

The council's 'Alternative' approach to the green network is to maintain the existing green spaces in their present form, with a clear urban fringe focus. This would continue to prioritise resources closest to the places people live and work, but would fail to capture the wider focus of the CSGN to link existing and new green spaces into wider multi-functional green networks.

Question 60

Do you agree with the 'Preferred' approach to the green network in West Lothian?
If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 61

Does the proposed West Lothian wide green network capture the best strategic opportunities or are there any missing links?

YES NO Don't know

Do you have any additional comments?

Question 62

Do you have any suggestions for a green network across West Lothian?

YES NO Don't know

Do you have any additional comments?

Question 63

Do you have any suggestions for a green network across West Lothian?

YES NO Don't know

Do you have any additional comments?

Question 64

Do you have an alternative approach? What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Question 65

What are your views on the proposed extension to the Pentland Hills Regional Park in West Lothian?

YES NO Don't know

Do you have any additional comments?

Biodiversity and Geodiversity (*paragraphs 3.190 – 3.197*)

Preferred approach

The council's 'Preferred' approach to biodiversity and geodiversity sites is to review and update the existing list of locally designated sites (Wildlife Sites and Regionally Important Geological/Geomorphological Sites RIGS) and to protect and promote improvements to them through Supplementary Guidance where appropriate. Policy protection for carbon-rich soils will be reinforced.

Alternative approach

The council's 'Alternative' approach to biodiversity and geodiversity sites would be not to promote Supplementary Guidance, but simply to map local sites within the LDP as at present. Whilst this might give the sites more prominence within the LDP, the process would be less functional.

Question 66

Do you have any general or specific issues with the proposed list of Local Biodiversity Sites and Local Geodiversity Sites?

YES NO Don't know

Do you have any additional comments?

Question 67

Do you agree with the 'Preferred' approach to Biodiversity and Geodiversity in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 68

Do you agree with the 'Alternative' approach to Biodiversity and Geodiversity in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 69

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

West Lothian Open Space Strategy 2005-2015 (paragraph 3.198)

Question 70

Do you have any views on what should be considered for the second Open Space Strategy for 2015/16?

Why should these be considered?

YES NO Don't know

Do you have any additional comments?

Preferred approach

The council's 'Preferred' approach to the historic environment is to review the current range of policies related to the historic environment, updating where necessary to reflect changes in legislation, and to prepare supplementary guidance to protect and promote built heritage assets and to consider designating conservation areas at Abercorn village and Hopetoun Estate. In addition, conservation area appraisals of all conservation areas will be progressed where resources allow.

Alternative approach

The council's 'Alternative' approach to the historic environment is to maintain the current approach to the historic environment and not to promote a conservation area at Abercorn village and Hopetoun Estate.

Question 71

Is the 'Preferred' approach to the historic environment in West Lothian appropriate?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 72

Do you agree with the 'Alternative' approach to the Historic Environment in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 73

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Preferred approach

The council's 'Preferred' approach to Bangour Village Hospital site is to support at least 550 houses at the site, with the precise number of houses being agreed through detailed assessment of a master plan and other supporting information. Delivery of the site will be allied to the delivery of the infrastructure required to support the development whilst having regard to the built and natural environmental sensitivities of the site.

Alternative approach

The council's 'Alternative' approach is that housing development at the Bangour Village Hospital site should be restricted to 500 units.

Question 74

Is the 'Preferred' approach to Bangour Village Hospital appropriate?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 75

Do you agree with the 'Alternative' approach to Bangour Village Hospital?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 76

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Preferred approach

The council's 'Preferred' approach to the former Bangour General Hospital site is to assess development proposals against development in the countryside policies in the LDP.

Alternative approach

The council's 'Alternative' approach to the Bangour General Hospital site is to maintain the policy presumption in favour of development as set out in the *West Lothian Local Plan*.

Question 77

Is the 'Preferred' approach to Bangour General Hospital appropriate?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 78

Do you agree with the 'Alternative' approach to Bangour General Hospital?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 79

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Preferred approach

The council's 'Preferred' approach to the Union Canal is to promote its tourism and recreational potential and to allow for sympathetic ancillary development at the most appropriate locations along its length, having regard as to how this best fits with the wider strategy being developed by Scottish Canals for the whole waterway and in consultation with other neighbouring local authorities.

The canal also has potential to be used as a means of sustainable transport, both for leisure and commercial purposes, and it is important that opportunities to enhance local use, access and bio-diversity are maximised.

Securing the long term maintenance of this important historic structure is also paramount and it is concluded that this is best achieved by ensuring that it is well used and has as diverse a range of functions as practicable.

The rural setting of the section of the Union Canal between Winchburgh and Broxburn should continue to be protected as countryside belt or as a candidate special Landscape Designation Area as identified in the draft Local Landscape Designation Review.

Alternative approach

The council's 'Alternative' approach to the Union Canal is that no development, on or directly abutting it, and particularly in the countryside between Broxburn and Winchburgh, should be permitted. This is considered necessary in order to maintain the established setting of the Union Canal and to conserve its historic fabric. The only concession would be for necessary maintenance or for works to improve the canal and public access to it.

Question 80

Is the 'Preferred' approach to the Union Canal appropriate?
If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 81

Do you agree with the 'Alternative' approach to the Union Canal?
If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 82

Do you have an alternative approach?
What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Public Art (*paragraph 3.213*)

Preferred approach

The council's 'Preferred' approach to public art is to continue to seek developer contributions appropriate to the scale and type of development and to review supplementary guidance.

Alternative approach

The council's 'Alternative' approach to public art is to cease requiring developer contributions for public art or to limit the circumstances under which contributions are required.

Question 83

Do you agree with the 'Preferred' approach to public art?
If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 84

Do you agree with the 'Alternative' approach to public art?
If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 85

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Main Issue 7: Climate Change and Renewable Energy (paragraphs 3.214 - 3.225)

How can future patterns of development in West Lothian increase climate resilience and contribute towards meeting Scottish Government targets for reducing greenhouse gas emissions and increasing renewable energy?

Preferred approach

The council's 'Preferred' approach for renewable energy is to retain the supportive policy framework for renewable energy developments, extending it to all low carbon energy technologies and implement the terms of supplementary guidance for wind energy developments.

Alternative approach

The council's 'Alternative' approach for renewable energy is to retain the current criteria-based wind energy policy, without the support of a spatial framework. This is not considered to provide the necessary guidance for landowners or the industry, as required by Scottish Government and would not be in accordance with current best practice, Scottish Planning Policy and guidance.

Question 86

Do you agree with the 'Preferred' approach to renewable energy?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 87

Do you agree with the 'Alternative' approach to renewable energy?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 88

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Flood risk and management (*paragraphs 3.226 – 3.229*)

Preferred approach

The council's 'Preferred' approach to flood risk is to maintain and update existing policies and supplementary guidance on flood risk, taking account of legislative requirements and emerging Scottish Government guidance, including the RBMP as appropriate.

Alternative approach

The council's 'Alternative' approach to flood risk is to go beyond requirements and identify and protect areas of land for natural flood management as this will be a consideration in the new management plans.

Question 89

Do you agree with the 'Preferred' approach to flood risk appropriate?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 90

Do you agree with the 'Alternative' approach to flood risk?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 91

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Air quality and noise (*paragraphs 3.230 – 3.232*)

Preferred approach

The council's 'Preferred' approach to air quality is to maintain and update existing policies on air quality, taking account of legislative requirements and any emerging Scottish Government guidance.

Alternative approach

There are no reasonable alternatives to the preferred approach.

Question 92

Do you agree with the 'Preferred' approach to air quality appropriate?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 93

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Main Issue 8: Minerals and Waste (paragraphs 3.233 – 3.246)

How can planning policy promote and ensure sustainable approaches to waste management and mineral resources in West Lothian?

Minerals (paragraphs 3.233 - 3.242)

Preferred approach

The council's 'Preferred' approach towards mineral extraction is to continue to implement the policy approach set out in the SDP and the adopted WLLP. The policy approach set out in these will however, be reviewed to take account of the guidance contained within SPP. This may be pursued through supplementary planning guidance.

Alternative approach

The council's alternative approach towards mineral extraction is to take a more liberal approach to opencast coal and hard rock extraction by widening the opencast coal "broad areas of search" and identifying the whole of West Lothian as an area of search for other minerals to be extracted, subject to environmental and residential amenity considerations and constraints, by identifying these areas and appropriate buffers beyond which the search for minerals could take place.

Question 94

Do you agree with the 'Preferred' approach to mineral extraction?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 95

Do you agree with the 'Alternative' approach to mineral extraction?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 96

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Preferred approach

The council's 'Preferred' approach towards waste management is to support the objectives of the Zero Waste Plan, to accommodate new provision through extensions to existing recycling facilities, or in other suitable areas and to provide a policy framework which supports the development of these facilities.

Alternative approach

The council has not identified a reasonable alternative approach to the preferred approach.

Question 97

Do you agree with the 'Preferred' approach to waste management?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 98

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Additional information

Extra page for additional information you want to give on question(s). Please state the question number text refers to.

A full supporting document has been submitted alongside the questionnaire. This fully details the representations made to both the specific questions asked and other aspects of the MIR. This must be read in conjunction with this representation form.



Representation to West Lothian Council Local Development Plan Main Issues Report

Site specific representations

Regenco Trading Limited



October 2014



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Introduction

1. PPCA Ltd has been instructed to by Regenco Trading Limited to make site specific representations to the West Lothian Council Local Development Plan Main Issues Report published for consultation purposes in August 2014. The following Report sets out the details of representations lodged.
2. This representation should be read in conjunction with the joint Regenco Trading Limited / Hopetoun Estate representations on housing land supply and landscape capacity to the south of Winchburgh to accommodate new development.

Representation 1: Local Development Plan Proposal HWh3 – Castle Road

3. Regenco Trading Limited supports the continued identification of Proposal HWh3 – Castle Road, Winchburgh in the Main Issues Report for residential development with a notional capacity of 10 dwellings on 0.62 hectares of land. RTL has control of the site and it forms part of the wider planning permission in principle and associated masterplan granted by West Lothian Council on 17th April 2012 for the strategic mixed use expansion of Winchburgh.

Representation 2: Land west of Ross's Plantation, east of Winchburgh

4. Regenco Trading Limited (RTL) wishes to make representation to the identification of land west of Ross's Plantation, east of Winchburgh (West Lothian Council reference EOI-0198) as identified in the Main Issues Report. The Main Issues Report notes that this is a 10.3 hectare site that it has identified as a preferred alternative to site EOI-1093 with a capacity of 250 residential units.
5. RTL is in control of this land. It forms part of planning permission 1012/P/05 for the strategic expansion of the settlement and is identified as existing woodland in the Masterplan appended to that permission. At an appropriate time, RTL will submit a Matters Specified in Conditions application for this land. As such, it is unnecessary for the Council to identify the land specifically for residential development as part of the Local Development Plan preparation process.



Representation 3: Countryside Belt Boundary

6. Regenco Trading Limited wishes to make representation to the existing boundary of the Countryside Belt as shown in the adopted Local Plan to the south of Winchburgh at the Niddry Castle Golf Course. It is contended that the northern portion of the Niddry Castle golf course should be removed from the Countryside Belt.
7. The current Local Plan designates a Countryside Belt between Winchburgh and East Broxburn to prevent coalescence. Representation has been lodged, separately, to the Main Issues Report that recommends an increase in the separation distance between Winchburgh and East Broxburn through a realignment of the north east corner of the East Broxburn Core Development Area boundary.
8. The current Local Plan notes that the landscape integrity of the area, community woodland provision and recreational access are important management objectives linked to the setting and amenity value of Greendykes Bing. It notes the potential for Heritage Park in this area. In this context, it is noted that in the Local Landscape Designation Review accompanying the Main Issues Report that there is a diversity of uses within the area to the south and west of Niddry Bing.
9. The scale and location of the land proposed for removal from the Countryside Belt would not adversely affect the countryside setting or amenity of the local area. It will maintain landscape integrity by working development proposals within the existing landscape framework. Provision of a formal park area linked to the nearby Bings, Niddry Castle and the Union Canal is proposed as part of the wider landscape capacity submission that has been submitted separately to the Local Development Plan Main Issues Report consultation process.

Representation 4: Land at Niddry Mains Golf Course (site EOI-0201)

10. Regenco Trading Limited (RTL) wishes to make representation to the non-allocation of land at Niddry Mains Golf Course for mixed use, including residential, development and associated uses. The site in question is referred to as site EOI-0201 in the Local Development Plan Main Issues Report and on the Winchburgh Proposals Map and named Site west of Niddry Castle, south of Winchburgh (see attached map). RTL is in control of the site and able to bring it forward for development in the short term (2016-2021).



11. The majority of the site is identified as a “preferred alternative” to the only Winchburgh preferred site in the Main Issues Report. It is, by admission in the Main Issues Report itself, Scottish Planning Policy and Strategic Development Plan compliant. It is located immediately adjacent to the urban edge of the village and will link directly into it and its local facilities and services. It is well enclosed from a visual perspective being viewed against a wider landscape framework in part from the Union Canal towpath to the south.
12. In order to maintain a minimum five year housing land supply at all times as required by Scottish Planning Policy and the SESplan Strategic Development Plan, the Council will have to significantly over allocate land for housing development that is deliverable in the short term to overcome land supply shortfalls as explained in the joint housing land representations to the Plan.
13. The Local Development Plan Main Issues Report notes that the preferred alternative site could accommodate approximately 250 dwellings. These would be delivered in a range of sizes, types and tenures in a mature landscape setting. Access to the site would come from the north and link directly into the B9080 as it passes through the village. The 2012 Grontmij Access Strategy (see Appendix 1) submitted as part of the Council call for sites exercise for the wider golf course confirms that a suitable access arrangement is possible to serve the golf course as a residential development opportunity.
14. In line with the requirements to maintain a five year housing land supply at all times and the scale of failure to do so in the West Lothian Council area at this time, it is confirmed that the site would be deliverable in the short term and would, as such, make a significant local contribution to reducing the land supply shortfall.
15. There is no issue with the deliverability of this site in the short term and in parallel with the ongoing strategic expansion of Winchburgh elsewhere in the village. There are four national house builders on site at this time and there will be six house builders, including the Council, within six months of this submission. Demand for additional land is positive and ongoing from both existing and other developers. The first phase of a new town centre will commence in late 2014. The proposed development is unique in terms of location and setting and it is contended that there will be no issue of site marketability here.
16. The accompanying landscape assessment confirms that the proposed development site can be accommodated as a southern expansion of Winchburgh without adversely impacting upon the setting of the village or leading to coalescence with East Broxburn to the south.

17. Identification of the site for mixed use, including residential, development would have wider benefits to the strategic delivery of infrastructure in Winchburgh and, especially, new education infrastructure. The site would make direct short term financial contributions on a pro-rata basis to the delivery of new non-denominational primary and secondary school facilities in the town necessary to accommodate the wider growth planned for Winchburgh. This would, in turn, provide additional certainty and thereby reduce risk to the Council over the deliverability of such infrastructure and, in particular, funding of the first phase of a new non-denominational secondary school. RTL is committed to the delivery of affordable housing as part of the wider Winchburgh expansion and 25% of the housing product that comes forward on this site would be of an affordable housing tenure as set out in Planning Advice Note 2/2010 and agreed in advance with the Council. It would make pro-rata contribution to other infrastructure such as roads and drainage as well as new community facilities such as town centre improvements, public art and open space provision in line with Development Plan requirements and the wider strategic growth of Winchburgh.
18. The site is currently in use as a part of a wider golf course and benefits from a mature landscape setting and clearly defined development boundaries. To the west is the East Coast Main Rail Line in cutting. To the east is Niddry Bing. To the north is Hawkhill Wood and, beyond that, existing Winchburgh and land with planning permission for mixed use development. To the south are Niddry Castle and its grounds and the remainder of the golf course. The Castle is a Listed Building and any development proposals would take full cognisance of its setting as part of detailed design proposals. The proposed development would work with the landscape setting to create a high quality residential layout. Given the location and scale of the proposed development site, it is considered essential that a masterplan be prepared and submitted as part of any future planning applications. Technical issues such as noise associated with the rail line would also be addressed through this route.
19. The proposed development of the site for housing and associated uses would result in the need to relocate the golf course to an alternative location. The golf club itself rents the land on which it plays and is experiencing financial difficulties at this time. RTL owns land elsewhere in Winchburgh that would allow such a relocation to take place. This would enable a new start to be made for the golfers who use this facility.
20. As confirmed in the submission made to the Council “call for sites” exercise in 2012 the site is free from constraints related to slope, aspect, flood risk, ground stability and vehicular



access which would preclude its development. The site drift geology is likely to comprise glacial till in the form of boulder clay generally less than 5m thick with shallow rock present over much of the site. There does not appear to be any coal or oil shale outcrops on the site nor are there any indications of recorded workings on environmental geology maps, it seems likely that this area is at negligible risk from mineral instability. Future site investigation will confirm this. Vehicular access is currently available to the site and does not provide a constraint. In terms of flooding, the Niddry Burn is to the south of the site. Any future development proposals will make allowance for this.

21. There are no known infrastructure constraints that would prevent this site coming forward in phase with strategic development to the south at Winchburgh and in line with the timeframe for the emerging Local Development Plan.
22. Physical infrastructure required for the site would be linked to, and provided in phase with, the provision of infrastructure – education, roads, drainage, utilities etc. from the wider Winchburgh Core Development Area planning permission. Foul and surface water will be connected into existing and proposed drainage.
23. It is recognised that such facilities may require expansion to accommodate further development and this would be provided in phase with site development and agreed in advance with the Council. New services and facilities may also come forward as a direct result of new housing proposals to the benefit of existing and future residents on the area. This is very much an ‘infrastructure led’ approach to site promotion and development. Preparation of a masterplan, as outlined above, would address any infrastructure issues that arise as a result of this, and other, development elsewhere in Winchburgh.
24. Appropriate discussions would be had with third party infrastructure providers e.g. West Lothian Council, Scottish Water and other utilities providers as to the timing and provision of new or extended facilities to accommodate additional development on this site as part of the Local Development Plan preparation process and well in advance of detailed development proposals coming forward.



Representation 5: Land at Niddry Castle Golf Course (site EOI-0199 (part))

25. Regenco Trading Limited (RTL) wishes to make representation to the non-allocation of land at Niddry Mains Golf course for mixed use, including residential, development and associated uses. The site in question is the site referred to EOI-0199 in the Local Development Plan Main Issues Report and on the Winchburgh Proposals Map and named Land at Niddry Castle Golf Club, south east of Winchburgh. RTL is in control of the site and able to bring it forward for development.
26. The Main Issues Report states that the site area is approximately 31.2 hectares. The revised site area of this submission is only approximately 11 hectares (see attached map). The net developable area, taking account of mitigation proposed in the accompanying OPEN Landscape Assessment including advance landscape planting, is proposed as circa 9 hectares. This has a residential capacity of circa 225 dwellings in a range and choice of sizes and tenures. The existing golf course would be relocated as part of any future development proposals.
27. The 2012 Grontmij Access Strategy (see Appendix 1) submitted as part of the Council call for sites exercise for the wider golf course confirms that a suitable access arrangement is possible to serve the golf course as a residential development opportunity.
28. To the north of the site is the Niddry Castle Bing. This is currently being depleted to provide raw materials for infrastructure projects across Scotland. To the west of the site is the balance of the Niddry Mains Golf Course that is subject of separate representation above. To the east is open agricultural land. To the south is the Newliston Garden & Designed Landscape in the City of Edinburgh Council area. This formal designation forms a clear and long term development edge.
29. RTL recognises that the site in question has a physical relationship with the Bing that is currently being depleted to the north. The removal of the Bing will bring about fundamental change in the landscape and this process is expected to be complete in or around 2024-25. The former Bing area, as a brownfield redevelopment site, will provide the opportunity for additional residential development on the urban edge of an extended Winchburgh.
30. The removal of the Bing fundamentally changes the relationship that the representation site will have to the Bing itself. The Bing is currently, but in the future no longer, a physical barrier to development. It will be removed and a land platform created with the



potential to accommodate residential and other uses on it. This establishes a physical and landform relationship between the depleted Bing site and site EOI-0199. It would form part of a wider standalone south Winchburgh Housing Market Area in conjunction with other areas promoted for development through representations that is separate, but complimentary, to development areas to the north and west currently under construction.

31. The removal of the Bing and creation of a land platform will also fundamentally alter the relationship between site EOI-0199 and the expanded village in that the site would be seen as both as part of the extended village and any development proposals that come forward for the depleted Bing site.
32. The site also has a direct physical relationship with Site EOI-0201, subject of separate representation, to the west. The site is in the control of RTL and there is no question of the site being made available for delivery of mixed use development. A desktop analysis has confirmed that there are no known physical, environmental or infrastructure constraints within this site that would prevent development. The Niddry Burn that runs along the southern edge of the Bing would be taken in to account in the design of any future development.
33. The identification of the site as proposed by this representation will not adversely impact upon the continuation of the Countryside Belt between Winchburgh and East Broxburn. There is no prospect of significant development within the Designed Landscape to the south of the site. The formation of a landscaped edge occupying the southern portion of site EOI-0199 formalises that separation distance whilst, at the same time, providing a permanent physical buffer to development and edge to the expanded Winchburgh settlement.
34. Preparation of a wider masterplan incorporating the Bing to the north would ensure that development is delivered in an appropriate manner.
35. Site development can commence in the latter portion of the medium term Local Development Plan period (2021-26) in the knowledge of final Bing depletion details at that time.
36. Representation is lodged, therefore, to the non-identification of Site EOI-0199 as a medium – long term growth area for the town. The identification of the land above complies with that remit and will provide certainty to the Council, developers, landowners and the community over the long term growth strategy for the southern edge of the settlement now that strategic expansion has started to the west and north.



Representation 6: Niddry Castle Bing

37. Regenco Trading Limited wishes to make representation to the non-allocation of the existing Niddry Castle Bing for long term mixed use development, including residential, uses (see attached map).

38. Regenco Trading Limited is contractually obliged to draw down the Bing area from the Hopetoun Estate in 2025. At that time, the Bing will, likely, be the single largest brownfield redevelopment opportunity in the West Lothian Council area. Scottish Planning Policy and the SESplan Strategic Development Plan actively support and prioritise the redevelopment of brownfield land for residential use. The identification of the Bing for mixed use development, including residential, at this time and the commitment to deliver that land from RTL as set out below would meet with national and strategic planning objectives. It would allow for timeous delivery of the land in question as technical matters could be dealt with in advance as depletion continues thus avoiding a delay situation where work is reactive during the relevant Local Development Plan preparation process. It would also minimise the need for greenfield land release elsewhere in the Council area through the relevant Local Development Plan at that time.

39. The site is currently a Bing that is being progressively depleted to be used in major infrastructure projects across Scotland. It is made ground comprising spent oil shale (“red blaes”) of very considerable thickness. The made ground overlies glacial till in the form of boulder clay that will, once depletion is complete circa 2024, provide a stable platform for future development purposes.

40. To the north and east of the site is the southern edge of the planning permission in principle that will result in the strategic mixed use expansion of Winchburgh. This will deliver development contiguous with the northern edge of what will be a brownfield development opportunity once the Bing depletion has been completed. To the west of the Bing is the East Coast Main Rail Line beyond which is the existing urban edge of Winchburgh and the Niddry Mains Golf Club. To the south is, again, the Golf Club and agricultural land. The Niddry Burn is located to the south of the site. Any future development proposals will make an appropriate allowance for this.



41. The Niddry Castle Bing is specifically highlighted as a future growth area in the approved Winchburgh Masterplan associated with planning permission 1012/P/05 – the strategic expansion of Winchburgh. This states –

“The potential development of Niddry Castle Bing should always be an aspiration. The demand for the bing blaes material is, however, unpredictable although a significant proportion is due for removal as part of the current M74 extension. Nevertheless, the Bing area has significant potential for development and may be appropriate for a number of uses, including residential and commercial. While there are no guarantees when it will become available, the principle of development should be accepted as part of the long-term regeneration and re-use of a major brownfield site. Its development can be readily “stitched” into the urban structure and landscape framework proposed within this Masterplan as a “seamless” extension of the adjacent residential neighbourhood.”

42. The Masterplan was last updated in 2009. There is a much greater degree of certainty known over the future depletion of the Bing and it will be capable of accommodating development post 2026.
43. There are no known infrastructure constraints that would prevent this site coming forward in phase with other development parcels to the south at Winchburgh and in line with the long term, post 2024, timeframe for the emerging Local Development Plan.
44. Physical infrastructure required for the site would be linked to, and provided in phase with, the provision of infrastructure – education, roads, drainage, utilities etc at the Winchburgh strategic expansion.
45. It is recognised that such facilities may require expansion to accommodate further development and this would be provided in phase with site development and agreed in advance with the Council. New services and facilities may also come forward as a direct result of new housing proposals to the benefit of existing and future residents on the area.
46. Preparation of a masterplan, as outlined above, would address any infrastructure issues that arise as a result of this, and other, development elsewhere in Winchburgh.



47. It is within the remit of the Main Issues Report to indicate a broad direction of growth for West Lothian Council post 2024 and to 2032 (Local Development Plan Main Issues Report paragraph 3.35).
48. Appropriate discussions would be had with third party infrastructure providers e.g. West Lothian Council, Scottish Water, utilities providers as to the timing and provision of new or extended facilities to accommodate additional development on this site as part of the Local Development Plan preparation process and well in advance of detailed development proposals coming forward.
49. The site could, provisionally, accommodate approximately 520 dwellings. On the basis of established and forecast build rates for the approved strategic expansion of Winchburgh and the need to provide and link into existing and new physical infrastructure it is anticipated that completions for this site would run at between 100 and 150 dwellings per year. It is anticipated that the site would take 5-7 years to build out.



Conclusion

50. In conclusion, RTL wishes to lodge representation to the West Lothian Council Local Development Plan Main Issues Report on the following matters –

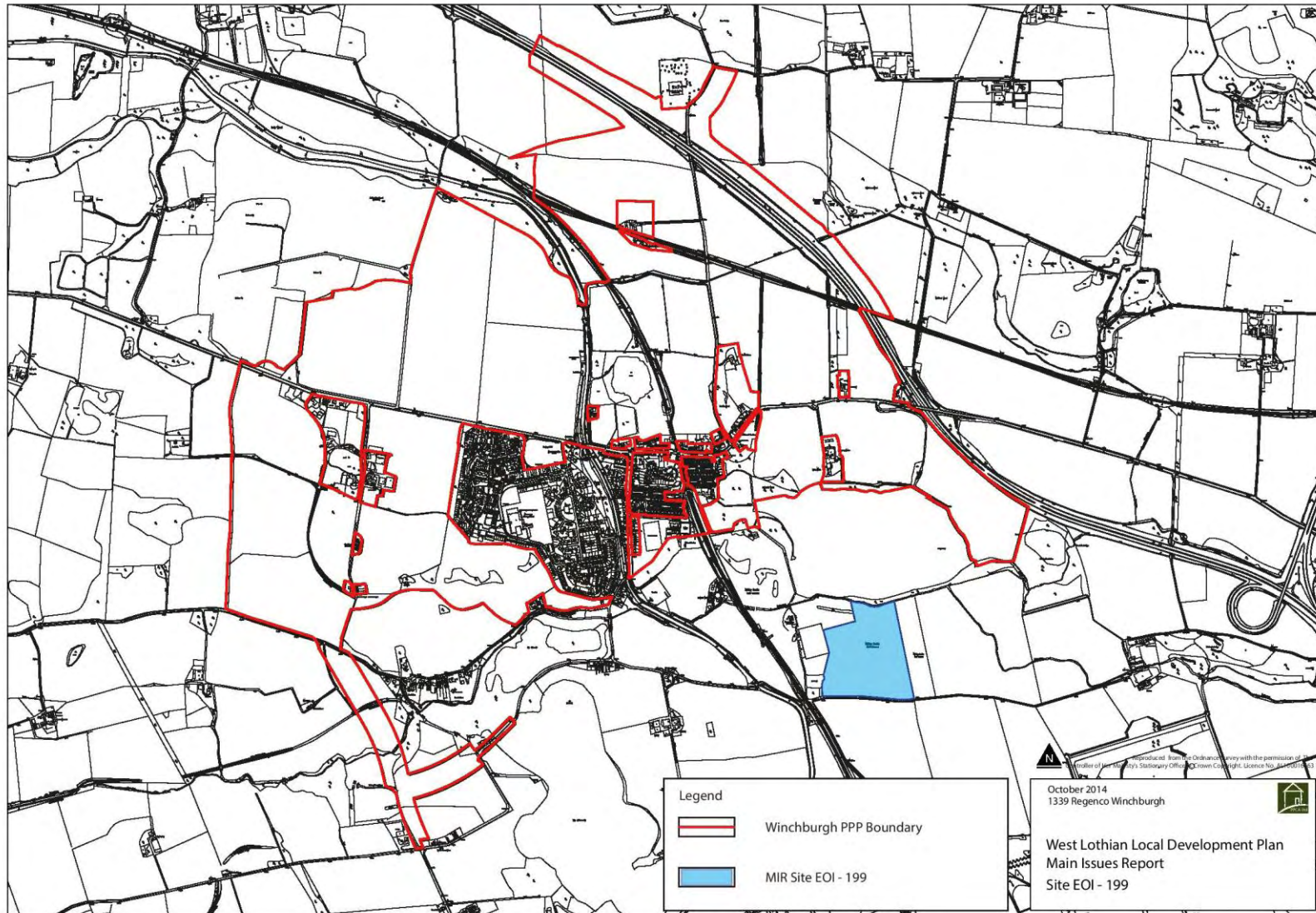
- Existing Countryside Belt designation as it affects the sites identified for residential development and associated uses on the northern and eastern portions of the Niddry Mains Golf Course. This designation should be removed from the Golf Course.
- Non-allocation of land for mixed use development including residential (circa 250 dwellings) on the northern portion of the Niddry Castle Golf Course (Council reference EOI-0201).
- Non allocation of land for mixed use development including residential (circa 225 dwellings) on the eastern portion of the Niddry Castle Golf Course (Council reference EOI-0199 (part)).
- Non allocation of the Niddry Castle Bing as a long term (post 2026) residential development opportunity following depletion of the landform for commercial purposes.
- Removal of land (Council reference EOI-0198) as shown in the Main Issues Report as a preferred alternative site for residential development. This forms part of planning permission 1012/P/05 and it is inappropriate for the Council to identify it for residential development through the Local Development Plan process.

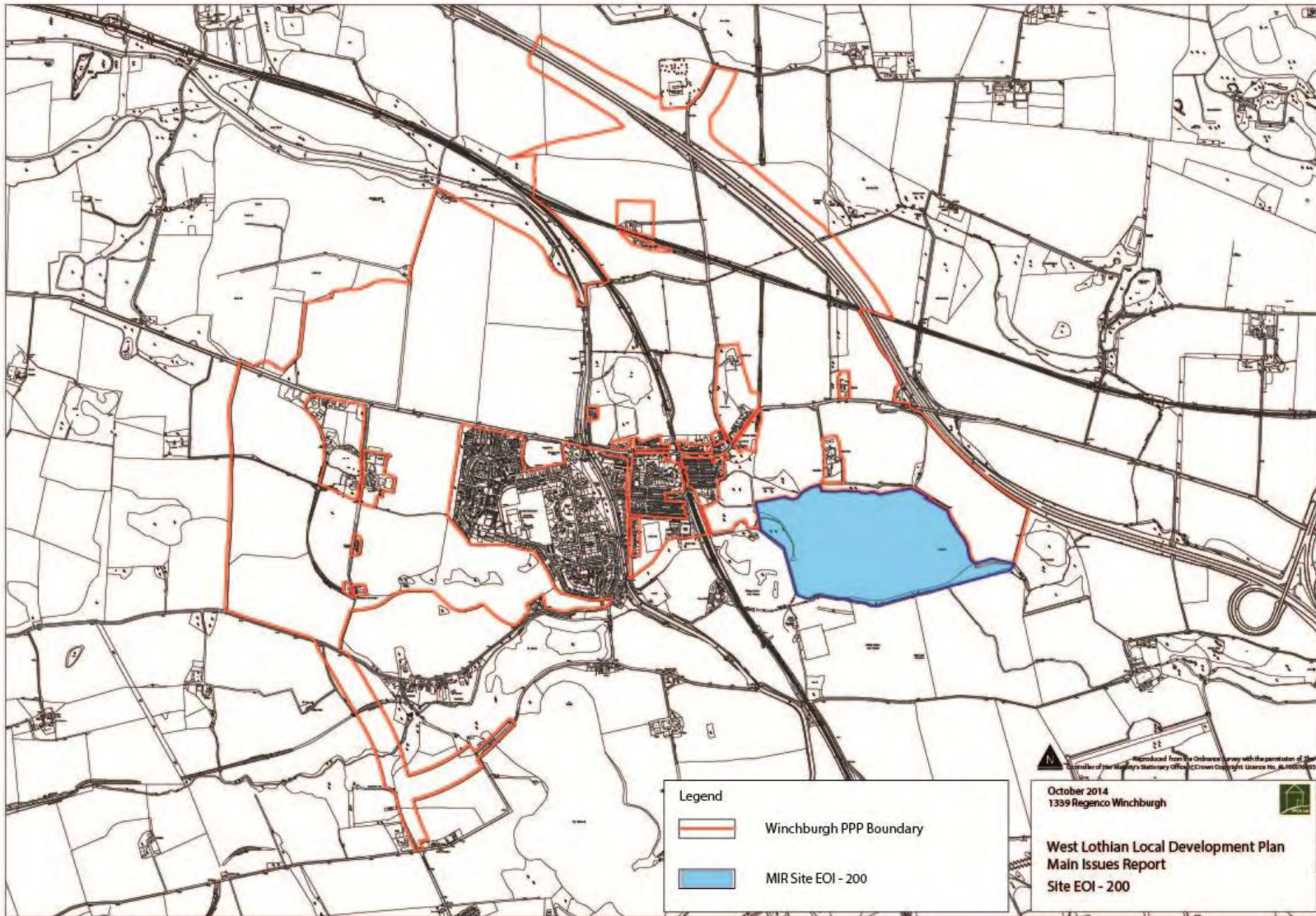
51. Collectively, the land parcels promoted for mixed use, including residential, development above will create a standalone south Winchburgh Housing Market Area that is well linked to the expanded settlement and complementary to it. This approach allows for a short, medium and long term approach to residential growth in Winchburgh to be set out at an early stage and managed in agreement with all interested parties to deliver high quality growth and, importantly, create a long term formal southern defensible edge to the expanded settlement.

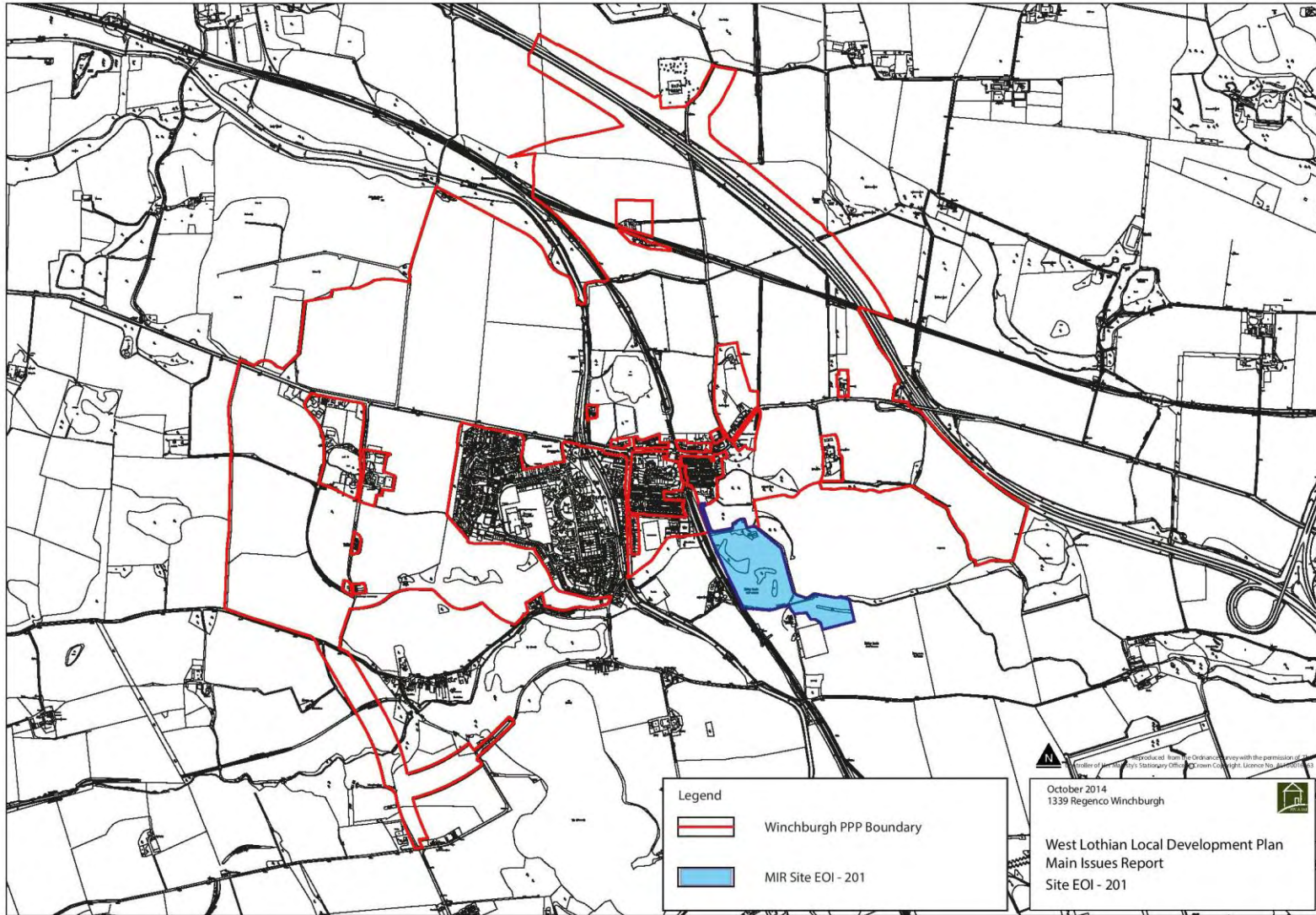


APPENDICES

MAPS for Sites EOI-0199 (part), EOI-0200 and EOI-0201









Grontmij Access Study

Grontmij have been commissioned to investigate the potential access options to the Niddry Castle Golf Club site (see Figure 1) for a potential residential development. This access appraisal has been undertaken on the basis that the site could cater for between 200 and 500 residential units. At present, Niddry Castle Golf Course is accessed from Castle Road, which connects into the B9080 – the main east-west route through Winchburgh. It accesses the Golf Course and a number of dwellings, including those on Castle Terrace and Oakbank Place. Castle Road is generally narrow and the reduced carriageway width is exacerbated by on street parking – the dwellings generally do not have driveways meaning drivers have no option but to park on the roadway. An advisory 20mph speed limit has been applied to Castle Road in order to improve road safety – a footway is only provided on one side of the road. Furthermore, a number of dwellings have a frontage directly onto Castle Road which creates further access issues for pedestrians. The southern section of Castle Road beyond the residential area extends to the golf club is of poor standard with no footpaths, tight radii and bad surfacing. Typical photographs of Castle Road are provided in Photos 1 and 2.



Photo 1 - Castle Road Looking Towards B9080



Photo 2 - Castle Road Looking Towards Golf Club

1. West Lothian Council's Development Control Guidelines require
 - a) 1 access point of a general access road standard for up to 200 residential units
 - b) 1 access point of a general access road standard and an emergency access for 200 – 300 residential units; and
 - c) 1 access point of a local distributor standard and an emergency access for up to 1000 units

Given the residential nature and current usage of Castle Road it is unlikely West Lothian Council would allow it to be used as the main route into the proposed development, due to its constraints of on street parking and the current 20mph speed limit.

2. It is therefore proposed to construct a new access route further east which will be designed to meet the 'General Access Road' or 'Local Distributor Road' standard. Two potential options have been considered for this new road and are outlined in Figure 2. It should be noted that these alignments transect an area of ancient woodland noted on OPEN's plan 121015 Winchburgh Designations"
3. Option 1 in Figure 2 shows an indicative alignment for a 'General Access Road'. This is a 5.5 metre wide road with two 2m footways which connects into the B9080 to form a signalised junction to the existing B8020.
4. Option 2 in Drawing Figure 2 shows an indicative alignment of a 'Local Distributor Road', which is 7.3m wide with two metre wide footways on both sides (the alignment of a General Access Road would follow a broadly similar trajectory with a narrower footprint due to less onerous width and gradient requirements). This connects into the B9080

**Briefing Note
Access Strategy**

close to the existing 30mph/gateway signs to the east of the village. No signals are proposed at this junction as visibility is reasonably good, however the gateway feature would be relocated to the east of the junction in order to reduce the speed of approaching traffic.

5. To complement either of the two options set out above, Castle Road could be utilised as an emergency access for the development. Vehicle movements would need to be restricted on this route with the implementations of a bollard or gate system to allow access for only emergency vehicles.

6. Additional routes have been examined but eliminated due to constrains:
 - a) Through the Bing – The topography makes it too difficult/costly to develop an acceptable route;
 - b) Peniel Place from Broxburn – Initially discounted due to weight restrictions and narrow bends and third party land.
 - c) Peniel Place from Niddry Road – Initially discounted due to narrow bridge over rail line and tight bends

7. Options 1 & 2 potentially provide an opportunity to create an access to the development which meets the requirements of West Lothian Council. It is recommended that the report findings be used to inform discussions with West Lothian Council.



- Notes:-
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Legend:-

- Golf Course (Hopetoun Land)
- Golf Course (Niddry Castle Land)

0	-	First Issue	-	-
No.	Date	Revision	By	Chk
Drawn:	Checked:	Approved:	Date:	
TJ Hill	T O'leary	AG Lewis	November 2012	

Regenco Trading Limited

Winchburgh
West Lothian

Development at Niddry Castle Golf Club

Access Strategy

Figure 1 - Site Location Plan

File Ref: WB-AS-F01	Drawing No: Figure 1
Original Size: 420x297 - A3	Scale: 1:25,000 Rev: 0

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